

IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI

UNITED STATES OF AMERICA

Plaintiff,

-vs-

Criminal Action No.  
23-00125-01/02-CR-W-BCW

BILAH RALLS, et al.,

Defendant.

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**MEMORANDUM OF MATTERS DISCUSSED AND  
ACTION TAKEN AT PRETRIAL CONFERENCE**

The following matters were discussed and action taken during the pretrial conference:

**PENDING CHARGES:**

Count One: Conspiracy to Distribute Fentanyl and Methamphetamine, *in violation of* 21 U.S.C. §§ 841(a)(1), (b)(1)(A) and 846 (both defendants)

Count Two: Possession with Intent to Distribute Fentanyl, *in violation of* 21 §§ 841(a)(1), (b)(1)(A) and 18 U.S.C. § 2 (both defendants)

Count Three: Possession with Intent to Distribute Methamphetamine, *in violation of* 21 U.S.C. §§ 841(a)(1), (b)(1)(A) and 18 U.S.C. § 2 (both defendants)

**TRIAL COUNSEL:**

Government: David Barnes & Maureen Brackett  
Case Agents: Det. Michael Wells & Detective Brandon Winders  
Defendant Ralls: Angela Hasty; paralegal Michelle Bibbs will assist  
Defendant McDowell: Dione Greene; associate Kristy Borders will assist

**OUTSTANDING MOTIONS:** None

**ANTICIPATED MOTIONS:**

- The Government intends to file a Rule 609 Notice.
- The Government will request Narcan be placed in the Courtroom.
- Defendant McDowell will request to wear civilian clothes during trial.

**TRIAL WITNESSES:**

Government: 12-15 with stipulations; 15-20 without stipulations  
Defendant Ralls: no additional witnesses; Defendant may testify  
Defendant McDowell: up to 3 additional witnesses; Defendant may testify

**TRIAL EXHIBITS:**

Government: 150 exhibits  
Defendant Ralls: 4 exhibits  
Defendant McDowell: 25 exhibits

**DEFENSES:**

Defendant Ralls:

- ( x ) defense of general denial  
( ) defenses of general denial and \_\_\_\_\_

Defendant McDowell:

- ( x ) defense of general denial  
( ) defenses of general denial and \_\_\_\_\_

**POSSIBLE DISPOSITION:**

Defendant Ralls:

- ( x ) Definitely for trial ( ) Possibly for trial  
( ) Motion to continue to be filed ( ) Likely a plea will be worked out

Defendant McDowell:

- ( x ) Definitely for trial ( ) Possibly for trial  
( ) Motion to continue to be filed ( ) Likely a plea will be worked out

**TRIAL TIME: 3 ½ days**

Government's case including jury selection: 2 ½ days  
Defendant Ralls: 1 hour  
Defendant McDowell: 1 day

**STIPULATIONS:**

- ( ) not likely  
( ) not appropriate  
( ) proposed as to:  
    ( x ) chain of custody  
    ( x ) chemist's reports  
    ( ) prior felony conviction  
    ( ) interstate nexus of firearm  
    ( x ) DNA

**UNUSUAL QUESTIONS OF LAW:** None

**FILING DEADLINES:**

**Witness and Exhibit Lists:**

Government: November 18, 2024

Defense: November 18, 2024

**Counsel are requested to list witnesses in alphabetical order on their witness list.**

**Exhibit Index, Voir Dire, Jury Instructions:** November 18, 2024  
**Jury instructions must comply with Local Rule 51.1**

**Motions in Limine:** November 18, 2024

**TRIAL SETTING:** Criminal jury trial docket commencing December 2, 2024

**Please note:** *The Government requests the second week of the docket, due to a family obligation the first week. Counsel for both defendants are available both weeks of the docket, but are agreeable to the Government's request for the second week.*

**OTHER:**

☐ A \_\_\_\_\_-speaking interpreter is required.

☐ Other assistive devices: \_\_\_\_\_

**IT IS SO ORDERED.**

/s/ Jill A. Morris  
JILL A. MORRIS  
United States Magistrate Judge